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5 Attorney for Octavio Moreno Reyna

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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 (HONORABLE ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,) Criminal No. 08CR1636-BEN
12 Plaintiff,)
13 v.) Date: June 30, 2008
14 OCTAVIO MORENO REYNA,) Time: 2:00 p.m.
15 Defendant.)
16)
TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and JEFFREY D.
MOORE, ASSISTANT UNITED STATES ATTORNEY

17 PLEASE TAKE NOTICE that Defendant, Octavio Moreno Reyna, by and
18 through his Counsel, David J. Zugman, files the instant joint motion to
19 continue the motion hearing from June 30, 2008, at 2:00 p.m. to August
20 11, 2008, at 2:00 p.m..

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Respectfully Submitted,

23 Date: June 25, 2008

S/David J. Zugman
David J. Zugman
Attorney for Mr. Reyna

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1 || PROOF OF SERVICE

2 I, the undersigned, declare that:

3 1. I am over eighteen (18) years of age; am a resident of the
4 County of San Diego, State of California; and my business address is 964
Fifth Avenue, Suite 300, San Diego, California, 92101-5008.

5 2. I am effecting service of JOINT MOTION TO CONTINUE THE MOTION
6 HEARING on the following parties by electronically filing the foregoing
with the Clerk of the District Court using its ECF System, which
electronically notifies them:

7 Jeffrey Moore, Assistant U.S. Attorney
8 Office of the U.S. Attorney
880 Front Street
9 San Diego, CA 92101

10 3. I hereby certify that I have mailed the foregoing, by United States
Postal Service to the following non-ECF participants in this case:

11 1. N/A

12 to the last known address, at which place there is delivery service of
13 mail from the United States Postal Service.

14 I declare under penalty of perjury that the foregoing is true and
correct.

15 Executed on June 25, 2008.

17 S/David Zugman
18 DAVID J. ZUGMAN

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8 UNITED STATES DISTRICT COURT

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10 (HONORABLE ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,)	Case No. 08CR1636-BEN
)	
12 v.)	Date: June 30, 2008
)	Time: 2:00 p.m.
13 OCTAVIO MORENO REYNA,)	JOINT MOTION TO CONTINUE THE
)	MOTION HEARING
15 Defendant.)	
)	

16 **THE PARTIES STIPULATE** to continue Mr. Reyna's motion hearing from
 17 June 30, 2008, at 2:00 p.m. to August 11, 2008, at 2:00 p.m.. This is
 18 the first continuance request for the motion hearing. The parties
 19 anticipate arriving at plea agreement which will obviate the need for
 20 the motion hearing. Further, the parties have matters to resolve which
 21 is why the agreement has yet to be finalized. Mr. Reyna is in custody.
 22 The new date and time have been cleared with this Court's clerk.

23 **IT IS SO STIPULATED:**

24 Dated: June 25, 2008 S/David Zugman
 25 DAVID ZUGMAN
 26 ATTORNEY FOR MR. REYNA

27 Dated: June 25, 2008 S/Jeffrey Moore
 28 JEFFREY MOORE
 ASSISTANT U.S. ATTORNEY